

UNITED STATES DISTRICT COURT

for the

Northern District of Texas

FILED

January 26, 2023

KAREN MITCHELL
CLERK, U.S. DISTRICT
COURT

United States of America
v.

RICHARD DANIEL GOMEZ

Case No. 3:23-MJ-83-BK

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of January 26, 2023 in the county of Dallas in the
Northern District of Texas, the defendant(s) violated:

Code Section

21 U.S.C. Sec 841 and 841(b)
(1)(A)(vi)

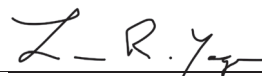
Offense Description

Possession of a Controlled Substance With Intent to Distribute said substance being 400 grams or more of a mixture or substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propenamide, also known as "fentanyl," a Schedule II controlled substance, in violation of 21 U.S.C. § 841(a)(1) and (b)(1)(A)(vi).

This criminal complaint is based on these facts:

See attached Affidavit of

☒ Continued on the attached sheet.



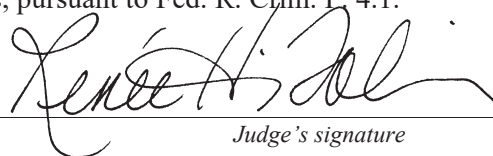
Complainant's signature

DEA TFO LANCE YAGER

Printed name and title

Agent sworn and signature confirmed via reliable electronic means, pursuant to Fed. R. Crim. P. 4.1.

Date: January 26, 2023



Judge's signature

City and state: Dallas, Texas

RENÉE HARRIS TOLIVER, U.S. Magistrate Judge 

Printed name and title

AFFIDAVIT

I, Lance Yager, a Task Force Officer (TFO) with the Drug Enforcement Administration (DEA), Dallas, Texas, being duly sworn, state:

1. I am an investigative or law enforcement officer of the United States within the meaning of Title 18, United States Code, Section 2510(7) who is authorized by law to conduct investigations and make arrests for offenses enumerated in Title 18, United States Code, Section 2516. I am currently employed by the Texas Department of Public Safety (Texas DPS) as a Special Agent and have been so employed by the Texas DPS for over 24 years. I am certified as a Master Peace Officer by the Texas Commission on Law Enforcement. I am currently assigned to the Drug Enforcement Administration (DEA), United States Department of Justice, as a Deputized Task Force Officer (TFO) and have been so assigned as such since December 2014. During my employment as both a Police Officer and as a TFO, I have received extensive training in drug trafficking and financial investigations involving proceeds derived from the sale of controlled substances and the manufacturing of controlled substances. I have used a variety of methods during drug related investigations, including, but not limited to, visual surveillance, general questioning of witnesses, and the use of search warrants, confidential informants, undercover agents, pen registers/trap and trace devices, electronic mobile tracking/monitoring devices, and Title III wire and electronic interceptions. Based on my training and experience relating to the investigation of drug traffickers, and based upon interviews I conducted with defendants, informants, witnesses, and participants in drug trafficking activity, I am familiar with the ways drug traffickers conduct their business. My familiarity includes the various

means and methods by which drug traffickers import and distribute drugs, their use of cellular telephones and calling cards to facilitate drug activity, and their use of numerical codes and code words to conduct drug transactions.

2. This affidavit is made in support of a criminal complaint against **RICHARD DANIEL GOMEZ** and for a violation of 21 U.S.C. 841(a)(1) and (b)(1)(A)(vi), possession with the intent to distribute a controlled substance in the Northern District of Texas

3. My knowledge of the facts alleged in this affidavit arise from information received from Texas Department of Public Safety (TXDPS) Special Agent Danny Dao and other participating law enforcement officers, to include but not limited to TXDPS and Dallas Police Department. Since this affidavit is limited to establishing probable cause, I have not included every fact known to me and other investigators. Rather, I am only submitting the facts necessary to establish probable cause that **Richard Daniel GOMEZ** knowingly and intentionally possessing with intent to distribute a controlled substance, said substance being 400 grams or more of a mixture or substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propenamide, also known as “fentanyl,” a Schedule II controlled substance, in violation of 21 U.S.C. § 841(a)(1) and (b)(1)(A)(vi).

4. On January 23, 2023, Texas Department of Public Safety (TXDPS) Criminal Investigation Division (CID), Special Agent (SA) Cody El-Khoury, acting in an undercover capacity (UC) began negotiations with Donald Derrell SLAY to purchase six thousand (6,000) “blue” pills for fifteen thousand dollars (\$15,000.00) in US currency.

Through training and experience, SA El-Khoury knows that often time “Blues” are fictitiously manufactured outside of approved laboratory and contain fentanyl. The UC and SLAY agreed to conduct the transaction at a later time.

5. On January 26, 2023, the UC received a text message from SLAY advising the UC where to meet for the transaction. SLAY told the UC to meet with his courier in the parking lot of 1405 Turtle Creek in Dallas, Texas. SLAY advised that the courier would arrive at the meet location in a black Jeep SUV.

6. Once the UC arrived at the meeting location, SLAY advised the UC to jump into the black Jeep Patriot parked in the parking lot. The UC got into the Jeep Patriot and met with Richard Daniel GOMEZ. GOMEZ provided the UC with a vacuumed sealed bag containing a large number of blue pills, labeled M30, the pills are believed to contain fentanyl.

7. After the UC observed the pills, TXDPS Special Agents placed GOMEZ under arrest without incident.

8. GOMEZ was mirandized and agreed to speak against his penal interest by admitting that he was delivering the pills for SLAY and the pills contained fentanyl.

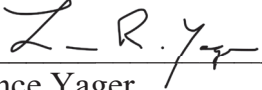
9. The field weight of the blue pills to include packaging was 668 grams.



10. Based on the above information, Affiant believes there is probable cause to

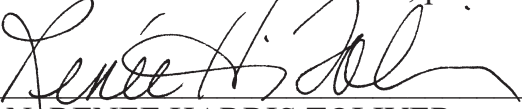
“fentanyl,” a Schedule II controlled substance, in violation of 21 U.S.C. § 841(a)(1) and (b)(1)(A)(vi).

11. Therefore, Affiant requests that an arrest warrant be issued for **Richard Daniel GOMEZ** for violations of 21 U.S.C. 841(a)(1) and (b)(1)(A)(vi).



Lance Yager,
Task Force Officer, DEA

Agent sworn and signature confirmed via reliable electronic means, pursuant to Fed. R. Crim. P. 4.1.



HON. RENEE HARRIS TOLIVER
UNITED STATES MAGISTRATE JUDGE